

**CONTINGENCY PLAN AND EMERGENCY PROCEDURES
FOR
HAZARDOUS WASTE RELEASE**

**LOCATED AT:
ESTATE OF CHEMETCO, INC.
3754 CHEMETCO LANE
HARTFORD, IL 62048**

**PREPARED BY:

GARY J. DAVIS, CHMM
EH&S MANAGER**

REVISED: FEBRUARY 16, 2010

A. REGULATORY AUTHORITY

This Contingency Plan and Emergency Procedures were prepared by the Bankruptcy Estate of Chemetco, Inc. to comply with *Subpart D: Contingency Plans and Emergency Procedures requirements of 35 Ill Adm Code Part 725 – Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities* as defined by the Illinois Environmental Protection Agency (IEPA).

B. GENERAL INFORMATION:

- | | |
|---------------|---|
| 1. Name: | Estate of Chemetco, Inc. (formerly Chemetco, Inc.) |
| 2. Location: | 3754 Chemetco Lane
Hartford, IL 62048

Between New Poag Road and Chemetco Lane (formerly Oldenburg Road)
on the east side of Route 3, approximately two miles north of Interstate
270. |
| 3. Telephone: | 618/254-4381 |
| 4. Operator: | Laura K. Grandy, Trustee
Bankruptcy Estate of Chemetco, Inc. |

C. PURPOSE AND IMPLEMENTATION

1. This plan is designed to set out an organized, planned and coordinated course of action to be followed to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.
2. ALL personnel involved will be familiar with the procedures and equipment described in the Contingency Plan and shall have participated in a formal training program prior to working in unsupervised positions.
3. The provisions of this plan should be carried out immediately whenever one of these events occurs or is imminent.
4. The revision to this plan is to include the operation of a Pilot Plant (in the Brick Shop) by Industrial Asset Disposition, LLC to demonstrate processing of metal bearing materials located on the site and the operation of a chemical laboratory in the former Corporate Offices.

D. EMERGENCY RESPONSE

1. Personnel Notification of Emergency Coordinators or Emergency Services

- a) In the event of such an occurrence, personnel should immediately notify the Emergency Coordinator or the Alternate (See List, Section D.2.). **Emergency Coordinators that are on the facility can be reached by office phone, cell phone or two-way radio.**
- b) If the Emergency Coordinators are not immediately available, personnel should notify local authorities and emergency services (See Notification List, Section D.4.). :

2. EMERGENCY COORDINATORS:

a) Primary Emergency Coordinator:

INDIVIDUAL NAME	HOME ADDRESS	OFFICE EXT	CELL
GARY DAVIS	2336 SPORTSMEN HILL DR CHESTERFIELD, MO 63017	372	636/346-0413

b) Alternate Emergency Coordinator

INDIVIDUAL NAME	HOME ADDRESS	OFFICE EXT	CELL
ERIC WATT	26992 BELTREES ROAD GODFREY, IL 62035	230	618/444-0622

3. NOTIFICATION BY EMERGENCY COORDINATORS

Whenever there is an imminent or actual emergency situation, the Emergency Coordinator (or alternate, if not available) must:

1. Immediately notify all personnel on the facility via radio, cell phones, or in person of the emergency and actions to be taken (i.e., evacuation - See Emergency Response and Evacuation Plan, Attachment A).
2. Notify the appropriate local, state and federal agencies with designated response roles if help is needed.

4. NOTIFICATION LIST:

MAJOR EMERGENCIES:

POLICE:	Madison County Sheriff's Dept.	911 618/692-4433
FIRE:	Mitchell Fire Dept.	618/931-1120
AMBULANCE:	(TELL 911 THAT YOU WANT ALTON MEMORIAL HOSPITAL AMBULANCE)	
	ALTON MEMORIAL HOSPITAL	618/463-7355

REGULATORY AGENCIES:

STATE:	ILLINOIS EMERGENCY MGMT AGENCY	800/782-7860
FEDERAL:	NATIONAL RESPONSE CENTER	800/424-8808 202/476-2675

HAZARDOUS MATERIALS RESPONSE:

MADISON Co. EMERGENCY MANAGEMENT AGENCY:	618/692-0537
---	---------------------

TRUSTEE, ESTATE OF CHEMETCO :

LAURA K. GRANDY, TRUSTEE:	618/660-6008
----------------------------------	---------------------

E. HAZARDOUS MATERIALS RELEASE

1. Identify Extent of Release

Whenever there is a release of hazardous materials, wastes or constituents, fire, explosion, or other applicable emergency, the Emergency Coordinator (or alternate, if not immediately available) must immediately identify the characteristics, source, estimated quantity, and the extent of any released hazardous materials. The Environmental Coordinator may do this by observation or review of facility records or manifests and, if necessary, by chemical analysis.

2. Assessment of Release

The Emergency Coordinator must assess possible hazards to human health and/or the environment that may result from a release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat induced explosions).

3. Notification of Release

If the Emergency Coordinator determines that the facility has had a release, fire, or explosion, they must report their findings as follows:

a) IF: Evacuation of Local Areas is Advisable

(1) The Emergency Coordinator must contact all local authorities and agencies (See telephone numbers, Section D.4.) and

(2) The Emergency Coordinator must notify the Illinois Emergency Management Agency and the National Response Center and be prepared to convey the following information:

- *Their name and telephone number where they can be reached (preferably cell number);*
- *Identify the Chemetco facility at Route 3 between New Poag Road and Chemetco Lane in Hartford, Madison County, Illinois;*
- *State the time and type of incident (i.e., hazardous release, fire, or explosion);*
- *Identify the type and quantity of material(s) involved, to the extent known;*
- *Specify the extent of injuries, if any; and*
- *Identify the possible hazards to human health and/or the environment outside the facility.*

b) IF: NO Evacuation of Local Areas is Advisable

(1) The Emergency Coordinator will determine if local authorities and/or emergency responders are needed (See telephone numbers, Section D.4.) and

(2) The Emergency Coordinator must notify the Illinois Emergency Management Agency concerning the uncontrolled release of hazardous materials and the National Response Center and be prepared to convey the following information:

- *Their name and telephone number where they can be reached (preferably cell number);*
- *Identify the Chemetco facility at Route 3 between New Poag Road and Chemetco Lane in Hartford, Madison County, Illinois;*
- *State the time and type of incident (i.e., hazardous release, fire, or explosion);*
- *Identify the type and quantity of material(s) involved, to the extent known;*
- *Specify the extent of injuries, if any; and*
- *Identify the possible hazards to human health and/or the environment outside the facility.*

4. Control Procedures

Personnel on the Chemetco facility, including the Emergency Coordinator, should only attempt to contain minor releases, fight fires, or otherwise respond to emergencies to the extent they are trained and equipped to do so and then, only to the extent necessary to minimize threat to themselves, other personnel on the facility, the public, and the environment. **LEAVE EMERGENCY RESPONSE, CONTAINMENT AND CLEANUP ACTIONS TO THE PROFESSIONALS.**

F. HAZARDOUS MATERIALS RELEASE POST-RESPONSE

1. Prevention of Recurrence or Spread of Fires, Explosions or Releases

Immediately after an emergency, the Emergency Coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire or explosion at the facility. All recovered material will be properly sampled, analyzed and packaged for disposal. The Emergency Coordinator will make an assessment of which materials can be processed on-site and make arrangements for the off-site disposal of the remaining materials at an approved disposal facility. The Emergency Coordinator will also see that all equipment is decontaminated prior to reuse.

2. Incompatible Wastes

The Emergency Coordinator must ensure that, in the affected area(s) of the facility, materials recovered from cleanup operations are not treated, stored, or disposed of with wastes that are incompatible. This will be accomplished by applying sampling, analysis, and handling procedures in conjunction with records and knowledge of the types and locations of on-site waste.

3. Post-Emergency Equipment Maintenance

The Emergency Coordinator must ensure that all emergency equipment listed in the Contingency Plan is decontaminated and fit for its intended use before operations are resumed. Any water used for decontamination purposes must be analyzed and disposed of accordingly. The Emergency Coordinator must inventory and reorder supplies consumed during any response.

4. Tank Leaks and Spills

If a leak is discovered in a tank, the necessary steps will be taken in order to repair the structure. If necessary, part or all of the contents will be removed in order to repair the structure.

5. Fire and Spill Control Equipment

Equipment	Use	Location
	Fire Control Equipment	
Dry Chemical Fire Extinguishers	For use against small electrical and paper/trash fires	Corp Offices/ Laboratory, Maintenance Shop, and Brick Shop/ Pilot Plant
	Spill Control Equipment	
Absorbent booms	Containment of large spills	Brick Shop/Pilot Plant and Maintenance Shop
Absorbent pads	Containment and absorbing of spills	Brick Shop/Pilot Plant and Maintenance Shop
Sodium Bicarbonate	Neutralize acid spills	Brick Shop/Pilot Plant
Acid	Neutralize caustic spills	Brick Shop/Pilot Plant
55 Gallon Drums	Containment of free liquids	Brick Shop/Pilot Plant
Bob Cat and Front End Loader	Movement of Solids	Maintenance Shop

G. ARRANGEMENTS AGREED TO BY LOCAL POLICE, FIRE, HOSPITAL, AND EMS EMERGENCY SERVICES

POLICE:	Madison County Sheriff's Dept.	618/692-4433
FIRE:	Mitchell Fire Dept.	618/931-1120
AMBULANCE AND HOSPITAL:	ALTON MEMORIAL HOSPITAL	618/463-7355

Approved copies of this Contingency Plan will be provided to the following, posted on the facility bulletin board, and placed in the Emergency Coordinator files:

- Tom Powell
Office of Emergency Response
Emergency Operations Unit
Illinois Environmental Protection Agency
2009 Mall Street
Collinsville, IL 62234
- Chris Cahnovsky
Regional Manager
Field Operations Section, Bureau of Land
Illinois Environmental Protection Agency
2009 Mall Street
Collinsville, IL 62234
- John Quigley
Coordinator
Madison County Emergency Management Agency
157 North Main Street, Suite 33
Edwardsville, IL 62025-1962
- Eddie Lee
Fire Chief
Mitchell Fire Department
213 East Chain of Rocks Road
Mitchell, IL 62040

- Stanley W. Krushas
Region 8 Coordinator
Illinois Emergency Management Agency
2105 Vandalia, Suite 6A
Collinsville, IL 62234-4859
- Emergency Coordinator
Alton Memorial Hospital
1 Memorial Drive
Alton, IL 62002
- Emergency Coordinator
Madison County Sheriff's Department
405 Randle
Edwardsville, IL 62025

H. INCIDENT REPORTING

The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, it must submit a written report on the incident to the Agency. The report must include the following information:

1. The name, address, and telephone number of the owner or operator;
2. The name, address, and telephone number of the facility;
3. The date, time, and type of incident (e.g., fire, explosion, etc.);
4. The name and quantity of materials involved;
5. The extent of injuries, if any;
6. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
7. The estimated quantity and disposition of recovered material that resulted from the incident.

Attachment A
Chemetco Site
Emergency Response and Evacuation Plan
Revised: February 16, 2010

**BANKRUPTCY ESTATE OF CHEMETCO, INC.
(FORMER CHEMETCO, INC.)**

CHEMETCO SITE EMERGENCY RESPONSE AND EVACUATION PLAN

**LOCATED AT:
3754 CHEMETCO LANE
HARTFORD, IL 62048**

PREPARED BY:

**GARY J. DAVIS, CHMM
EH&S MANAGER**

REVISED: FEBRUARY 16, 2010

**CHEMETCO SITE
EMERGENCY PLAN AND EMERGENCY EVACUATION PLAN
REVISED: FEBRUARY 16, 2010**

I. GENERAL INFORMATION:

- A. Name: Bankruptcy Estate of Chemetco, Inc.
(former Chemetco, Inc. secondary copper smelter)
- B. Location: 3754 Chemetco Lane
Hartford, IL 62048

Between Poag Road and Chemetco Lane
on the east side of Route 3, approximately two miles
north of Interstate 270.
- C. Telephone: 618/254-4381
- D. Operator: Bankruptcy Estate of Chemetco, Inc.
Laura K. Grandy, Trustee
23 Public Square, Suite 300
Belleville, IL 62222-0307
Office: 618/234-9800

II. PURPOSE

This plan is designed to set out an organized, planned and coordinated emergency response and emergency evacuation of personnel on the former Chemetco, Inc. secondary copper smelter site whenever there is a threatened, imminent or actual emergency situation that threatens the environment and/or human health, such as:

- A. Personnel injury,
- B. Release or imminent release of hazardous materials from, spills, fire, explosion or other actions, or
- C. Adverse weather conditions, such as shelter from a tornado.

**CHEMETCO SITE
EMERGENCY PLAN AND EMERGENCY EVACUATION PLAN
REVISED: FEBRUARY 16, 2010**

The Contingency Plan has been revised to include the use of the Brick Shop by Industrial Asset Disposition, LLC (IAD) for operating a Pilot Plant processing metal bearing materials from the site. It is also revised to include IAD's renovation of the former vacant corporate office building to a chemical laboratory and parts of the building for use as offices by IAD.

III. COMPLIANCE

All personnel entering the facility are responsible to read this plan and indicate their understanding and agreement to comply with the plan by signing and dating the "Emergency Response and Evacuation Plan" Notification Sheet, maintained by Judy Gifford in the Chemetco/Engineering Offices.

IV. EMERGENCY COORDINATORS:

1. Primary Emergency Coordinator:

Individual Name	Office Phone	Cell Phone
Gary Davis	618/254-4381 x372	636/346-0413

2. 1st Alternate Emergency Coordinator

Individual Name	Office Phone	Cell Phone
Eric Watt	618/254-4381 x230	618/444-0622

3. 2nd Alternate Emergency Coordinator

Individual Name	Office Phone	Home Phone
George Boud	618/254-4381 x230	618/254-2002

**CHEMETCO SITE
EMERGENCY PLAN AND EMERGENCY EVACUATION PLAN
REVISED: FEBRUARY 16, 2010**

V. EMERGENCY SERVICES NOTIFICATION LIST:

MAJOR EMERGENCIES:

911

**CALLING 911 WILL DISPATCH ALL SERVICES INCLUDING
FIRE DEPT AND AMBULANCE (TELL 911 YOU WANT ALTON
MEMORIAL HOSPITAL AMBULANCE)**

**POLICE: Madison County Sheriff's Dept. 618/692-4433 (FOR
NON-EMERGENCY REPORTS)**

REGULATORY AGENCIES:

STATE: ILLINOIS EMERGENCY MGMT AGENCY 800/782-7860

**FEDERAL: NATIONAL RESPONSE CENTER 800/424-8802
202/263-2675**

HAZARDOUS RESPONSE PROFESSIONALS:

ENVIRONMENTAL MGMT ALTERNATIVES (PAGER): 314/253-1305

TRUSTEE, ESTATE OF CHEMETCO, INC.:

LAURA K. GRANDY, TRUSTEE: 618/660-6008

VI. MEDICAL FACILITY LOCATION MAP

The distance and route to the nearest emergency medical facility (Alton Memorial Hospital) is shown on the Medical Facilities Location Map, Attachment A.

VII. Facility Layout Map with Evacuation Routes

The route and location of evacuation assembly areas is shown on the Emergency Evacuation Map, Attachment B.

**CHEMETCO SITE
EMERGENCY PLAN AND EMERGENCY EVACUATION PLAN
REVISED: FEBRUARY 16, 2010**

VIII. EMERGENCY RESPONSE

A. Emergency Notification

1. **ALL** personnel on the facility have the responsibility for immediately reporting to the Emergency Coordinator any situation that could be threatening to human health or the environment, including:

- a) Injury to personnel on the facility;
- b) Releases or the imminent threat of releases of hazardous materials or constituents, spills, fires, or explosions to air, land, or water;
- c) Threatening or imminent weather conditions, such as a tornado warning or sighting; or
- d) Any other occurrence that the personnel believes to be an emergency that warrants emergency services.

2. In the event of such occurrences, personnel should immediately notify the Emergency Coordinator (See list of Emergency Coordinators in Section IV). **Emergency Coordinators can be reached by two-way radio or office phone, if on the facility, or by cell phone, if off the facility or property or not otherwise reached by two-way radio or office phone.**

B. Emergency Response

1. For Lifesaving Injuries or Events

- a) Personnel should stabilize injured party,
- b) Administer First Aid,
- c) Contact Emergency Coordinator, if not immediately available call 911 or emergency services listed in **section V. Emergency Notification List**,

**CHEMETCO SITE
EMERGENCY PLAN AND EMERGENCY EVACUATION PLAN
REVISED: FEBRUARY 16, 2010**

- d) Emergency Coordinator and/or personnel administering to the injured party will stay with the party until emergency services arrive, and
- e) Emergency Coordinator will investigate cause of injury to prevent future accidents before any work continues.

2. For Emergency Releases or Threats of Release

- a) Attempt to minimize the release to the extent to which personnel have been trained and equipment is available,
- b) Notify Emergency Coordinator to summon appropriate emergency services **(See section V. Emergency Notification List.)** and coordinate with them upon their arrival at the facility, and
- c) If environmental cleanup is required, Emergency Coordinator will contact appropriate environmental cleanup company to mobilize to the facility.

3. Environmental Release Reporting

Whenever there is a release of hazardous materials, wastes or constituents, fire, explosion, or other applicable emergency, the Emergency Coordinator (or alternate, if not immediately available) must immediately identify the characteristics, source, estimated quantity, and the extent of any released hazardous materials. The Environmental Coordinator may do this by observation or review of facility records or manifests and, if necessary, by chemical analysis.

a) Assessment and Notification

The Emergency Coordinator must assess possible hazards to human health and/or the environment that may result from a release, fire, explosion. This assessment must consider

CHEMETCO SITE
EMERGENCY PLAN AND EMERGENCY EVACUATION PLAN
REVISED: FEBRUARY 16, 2010

both direct and indirect effects of the release, fire or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat induced explosions). If the Emergency Coordinator determines that the facility has had a release, fire, or explosion, they must report their findings as follows:

(1) If their assessment indicates that evacuation of local areas may be advisable, they must immediately notify the Fire Department, the Madison County Sheriff's Department, the Illinois Emergency Management Agency, and the National Response Center and be prepared to convey the following information:

- i. Their name and telephone number where you can be reached (preferably cell number);
- ii. Identify the Chemetco facility at Route 3 between Poag Road and Chemetco Lane in Hartford, Madison County, Illinois;
- iii. State the time and type of incident (i.e., hazardous release, fire, or explosion);
- iv. Identify the type and quantity of material(s) involved, to the extent known;
- v. Specify the extent of injuries, if any; and
- vi. Identify the possible hazards to human health and/or the environment outside the facility.

**CHEMETCO SITE
EMERGENCY PLAN AND EMERGENCY EVACUATION PLAN
REVISED: FEBRUARY 16, 2010**

b) If the Environmental Coordinator's assessment indicates that evacuation of local areas may be advisable, they must immediately notify the Fire Department, the Madison County Sheriff's Department, and the Illinois Emergency Management Agency.

IX. EMERGENCY EVACUATIONS

A. Compliance

During an Emergency Evacuation ALL personnel on the facility will comply with the instructions of the Emergency Coordinator and will carry out those instructions in a timely and orderly manner commensurate with the instructions and the emergency at hand. ALL personnel will evacuate the facilities through the routes shown on the Evacuation Map, Attachment B and assemble in the Main Parking Lot unless otherwise instructed by the Emergency Coordinator.

B. Emergency Evacuation

If an Emergency Evacuation is warranted, the Emergency Coordinator will:

1. Contact any required emergency services or environmental cleanup contractor,
2. Notify ALL personnel on the facility in person, via two-way radio, or cell phone about the imminent or actual emergency situation,
3. Issue the evacuation notice,
4. Coordinate the evacuation and accounts for all personnel on the facility based on that day's "Sign-In" sheet,
5. Coordinate with emergency services upon their arrival,
6. Declare when the emergency evacuation is over and personnel can return to the facility or are otherwise informed by the Emergency Coordinator.

**CHEMETCO SITE
EMERGENCY PLAN AND EMERGENCY EVACUATION PLAN
REVISED: FEBRUARY 16, 2010**

X. "SIGN IN/SIGN OUT" – ACCOUNTING FOR ALL PERSONNEL IN AN EMERGENCY:

- A. ALL personnel will "sign in" on the sheet provided at their entrance to the facility and will "sign out" when leaving the facility, even if they are to be off-facility for only a few minutes.**

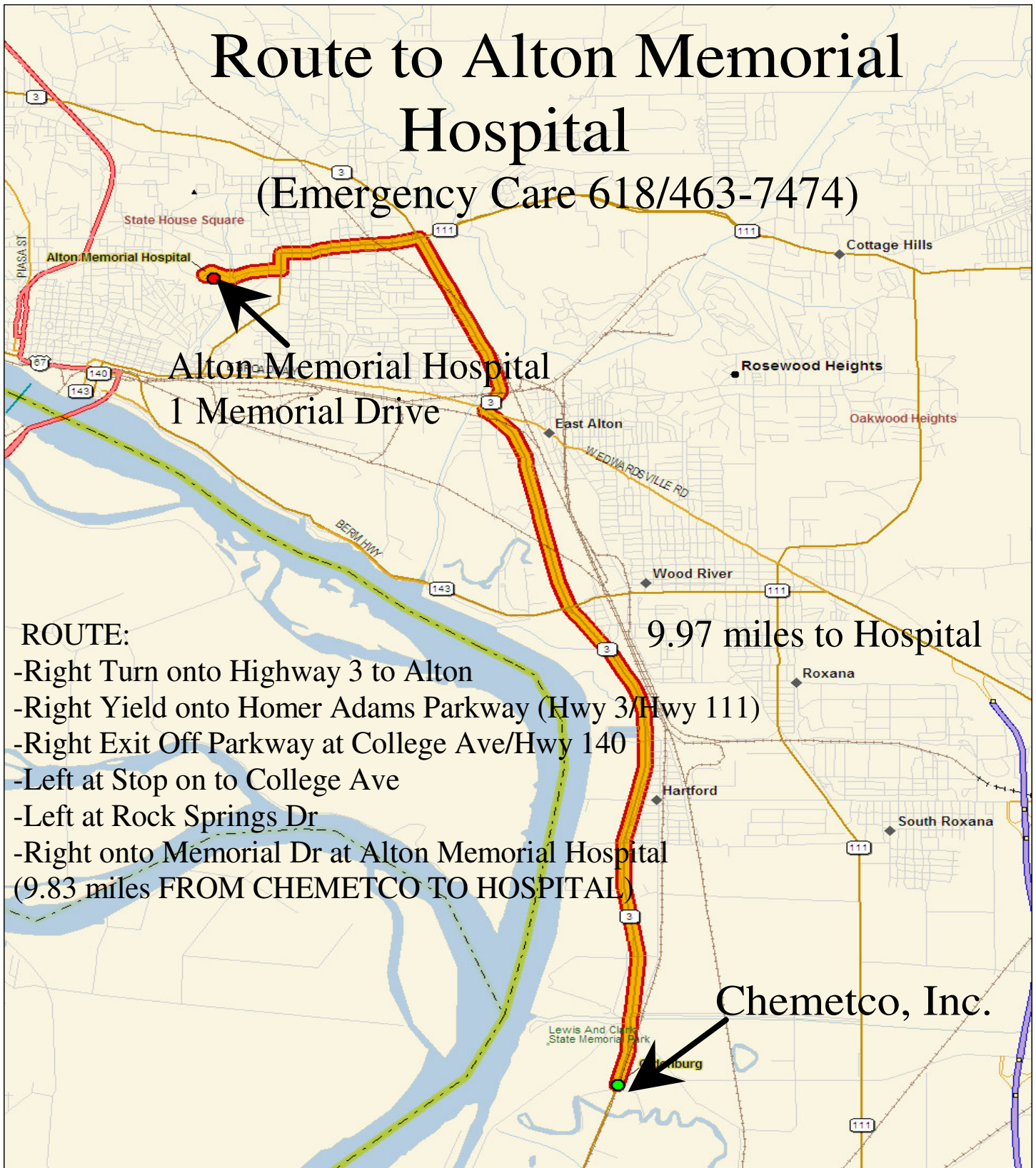
- B. The Sign In Sheet will be used by the Emergency Coordinator and emergency responders as the official list to insure all personnel on the facility have been accounted for during an emergency and during an emergency evacuation of the facility.

ATTACHMENT A
MEDICAL FACILITIES LOCATION MAP

Attachment A

Route to Alton Memorial Hospital

(Emergency Care 618/463-7474)

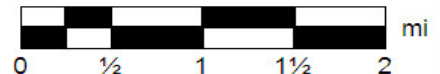


© 2003 DeLorme
www.delorme.com

Street Atlas USA® 2004



MN (0.5° W)



Data Zoom 11-5

ATTACHMENT B
EMERGENCY EVACUATION MAP

Chemetco Site Evacuation Routes and Assembly Area

